

The Honorable Robert J Bryan

7  
8  
9  
10  
11  
12  
13  
14  
15  
16

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER M. COX,

Defendant.

NO. CR21- 5221RJB

INFORMATION

(FELONY)

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The United States Attorney charges that:

**COUNT 1**

**(Smuggling Goods into the United States)**

On a date unknown, but within the last five years, and no later than January 11, 2019, in Pierce County and elsewhere, in the Western District of Washington, Defendant, CHRISTOPHER M. COX, willfully and knowingly and with intent to defraud the United States, did make out and pass through a customhouse a false, forged, and fraudulent document and paper, that is, Customs and Border Protection official documentation for a 2001 Honda Vamos, HM21204538, Entry# BMG-0519661-6, Reference# BG058910.

All in violation of Title 18, United States Code, Section 545.

//

//

INFORMATION - 1

*United States v. Christopher M. Cox*

UNITED STATES ATTORNEY \\  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

**COUNT 2****(Clean Air Act False Statements)**

On a date unknown, but within the last five years, and no later than on or about January 11, 2019, in Pierce County and elsewhere, in the Western District of Washington, Defendant CHRISTOPHER M. COX knowingly filed or caused to be filed EPA Form 3520-1 and information to the U.S. Customs and Border Protection's Automated Commercial Environment (ACE) system that contained material false statements, to wit: a 2001 Honda Vamos, HM21204538, Entry# BMG-0519661-6, Reference# BG058910, a vehicle Defendant CHRISTOPHER M. COX was importing to the United States, was identical in all material respects to a U.S. certified version when, in truth and in fact, no such vehicle had been certified by the U.S. EPA. EPA Form 3520-1 is required to be filed pursuant to Section 208 of the Clean Air Act, 42 U.S.C § 7542, for the importation of motor vehicles subject to air pollution regulations.

In violation of Title 42, United States Code, Sections 7413(c)(2)(A) and 7542, Title 18 United States Code Section 2.

**COUNT 3****(Possession of Child Pornography)**

Beginning on an unknown date, and continuing until July 22, 2020, in Mason County, and elsewhere within the Western District of Washington, and elsewhere, Defendant, CHRISTOPHER M. COX did knowingly possess matter that contained visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and the images of child pornography

involved include images of a prepubescent minor and a minor who had not attained 12 years of age.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

### **FORFEITURE ALLEGATION**

The allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, the defendant CHRISTOPHER M. COX forfeits to the United States any property that constitutes or is traceable to proceeds the defendant obtained from his commission of the offense, as well as any property introduced into the United States in violation of the offense alleged in Count 1, or the value of such property. All such property is forfeitable pursuant to Title 18, United States Code, Sections 545 and 982(a)(2)(B) and includes, but is not limited to a sum of money reflecting the proceeds he obtained from his commission of the offense.

Upon conviction of the offense alleged in Count 3, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all property he used to commit or to facilitate his commission of the offense, any proceeds of the offense, and any data files consisting of or containing visual depictions within the meaning of Title 18, United States Code, Section 2253(a)(1). This property includes, but is not limited to:

- a. Any and all images of child pornography, in whatever format and however stored;
- b. Motorola Moto Z2;
- c. HP Laptop #CNF046BYN9;
- d. Sony Laptop #SVT151A11L;
- e. Gateway Laptop #1PA6A000155;
- f. Sony Vaio Laptop #281982333458739;
- g. Gateway Laptop #1TA65070184;
- h. Gateway Laptop #1MA30000496;

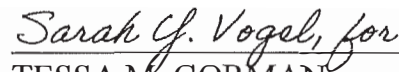
- i. Gateway Laptop #1MA80000026;
- j. Gateway Laptop #1TA60000104;
- k. Vaio Laptop #282094333000708;
- l. Gateway Laptop #1TA65060896;
- m. Gateway Laptop #1PA25011410;
- n. Acer Tablet #MMLYRAA002312004327501;
- o. Digland Tablet #1408/1008L/092013;
- p. Samsung Tablet #R52FB12GBA9V;
- q. Seagate Hard Drive #5PV1328A;
- r. Seagate Hard Drive #5VH26G1Q;
- s. Western Digital Hard Drive #WXC108782406;
- t. Western Digital Hard Drive #WXH109352604;
- u. HGST Hard Drive #1C0RPXJJ;
- v. Hitachi Hard Drive #11513N6796Z12975302WS9;
- w. Hitachi Hard Drive #X0HNNH73R;
- x. Samsung Hard Drive #S0A8J30L360777
- y. four DVDs;
- z. fourteen SD Cards;
- aa. three USB sticks;
- bb. iPhone IMEI #35837206158739;
- cc. iPhone IEMI #356600080704908;
- dd. iPhone FCC ID #BCGE2944A;
- ee. iPhone IEMI #354450060801246;
- ff. Verizon Motorola Cellphone;
- gg. iPhone IMEI #359684066493748; and
- hh. Samsung Cellphone.

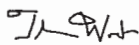
**Substitute Assets.** If any of the forfeitable property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

DATED this 6<sup>th</sup> day of July, 2021.

  
TESSA M. GORMAN  
Acting United States Attorney

  
THOMAS WOODS  
Assistant United States Attorney

  
CECELIA Y. GREGSON  
Assistant United States Attorney